

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Shelly K. Chappell	:	Chapter 13
	:	
Debtor	:	Bankruptcy No.17-15397-JKF
	:	
	:	Objection to Proof of Claim#8
	:	of Midland Funding LLC
	:	

**Request for Admissions Pursuant to Rule 36 of the  
Federal Rules of Civil Procedure**

Pursuant to Rule 7036 of the Federal Bankruptcy Rules and Rule 36 of the Federal Rules of Civil Procedure, Shelly K. Chappell requests that the Claimant, Midland Funding LLC answer each of the following Requests for Admissions, separately and under oath, within thirty (30) days from the date of service hereof. If the space provided after each is not sufficient for your answer, please use additional sheets. A true and correct copy of each document referenced is attached to these Requests for Admissions.

1. It is admitted that Midland Funding LLC filed Claim # 8 in the Chapter 13 Bankruptcy Case of Shelly K. Chappel, case number 17-15397, and Exhibit, attached to the Objection, is a true and correct copy of the claim filed.
2. It is admitted that you filed a claim against Debtor, Shelly K. Chappell.
3. It is admitted that the proof of claim asserts Shelly K. Chappell is the sole Debtor to the proof of claim.
4. It is admitted that the Debtor did not use or make payment on this debt within four (4) years from the filing date of 8/8/2017, of this instant Chapter 13 Bankruptcy.
5. It is admitted that you do not have a right to assert this claim and such claim exceeds the Pennsylvania Statue of Limitations.
6. It is admitted that the claim in which you filed originated with Credit One Bank, N.A. account number ending 1604.
7. It is admitted that this claim should be disallowed from the claims register.

/s/ Brandon Perloff, Esq.  
Brandon Perloff, Esquire  
Attorney for Debtor